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February 22, 2022

VIA ECF

Hon. Paul G. Gardephe
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Nicole Bell, 21-cr-145 (PGG)

Your Honor:

I am CJA counsel to Nicole Bell. I write, with no objection from the government, to request a 14-day extension of time to file any objections to the first disclosure of the presentence report ("PSR"), which are currently due February 23, 2022.


A copy of the first draft of the PSR was mailed to Ms. Bell the day we received it, February 9, 2022. As of the date of this letter, Ms. Bell has yet to receive it.

Accordingly, we respectfully request a two-week extension of time to file any objections to the PSR. As noted, the government does not object to this request.

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: February 23, 2022

Respectfully submitted,

/s/

David S. Greenfield

cc: All Parties (via ECF)